



March 9, 2004

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C., 20551

Via E-Mail: regs.comments@federalreserve.gov

Re: Comments to Proposed Amendments to Regulation CC
Docket No.: R-1176

Dear Ms. Johnson;

SunTrust Banks, Inc. ("SunTrust") submits this letter in response to the Board's request for comments on proposed changes to Regulation CC and the accompanying commentary that would implement the Check Clearing Act for the 21st Century Act.

SunTrust is a diversified commercial banking organization headquartered in Atlanta, Georgia. As of December 31, 2003, SunTrust had total assets of \$125.4 billion and total deposits of \$81.2 billion. The company operates through an extensive distribution network primarily in Florida, Georgia, Maryland, Tennessee, Virginia and the District of Columbia, and also serves customers in selected markets nationally. SunTrust's primary businesses include deposit, credit, trust and investment services. Through various subsidiaries, the company provides credit cards, mortgage banking, insurance, brokerage and capital markets services.

Shortly after the Board released the proposed amendments, SunTrust commissioned an internal team composed of members of our Legal, Compliance, and Banking Services Divisions to review the proposed changes. Our team, after making an independent review of the proposals, collaborated with the members of the Electronic Check Clearing House Organization ("ECCHO") and the Electronic Clearing Services (ECS) [a subsidiary of the Small Value Payment Company ("SVPCo.")] to prepare their respective responses. Additionally, the team participated through "ECCHO" in the drafting of the joint financial services industry organizations and Technology Company's response.

Rather than paraphrase the comments included in the aforementioned documents we would like to simply confirm our strong endorsement of the comments contained in them.

SunTrust appreciates the opportunity to offer our comments through the documents mentioned and is ready to provide any additional assistance the Board may need regarding this proposal. Should any questions arise concerning this comment letter, please do not hesitate to contact me.

Sincerely,

Louis S. Tiller, Jr.
Senior Vice President
SunTrust Banks, Inc.